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November 9, 1988

TO: File

FROM: Lynn Kunzler, Reclamation Biologist *LK*RE: Resolution of Forest Service Comments, Genwal Coal Company,  
Crandall Canyon Mine, ACT/015.032, Folder #2, Emery County,  
Utah

On November 4, 1988, I called Mr. Bob Thompson of the Manti-LaSal National Forest to discuss comments made by the Forest Service on October 17, 1988, and June 1, 1988, relative to the revegetation plan for the referenced mine.

Points of discussion centered on changes to the original (1982) seed mix that were made and concerns regarding the proposed changes as recommended by U.S. Forest Service on June 1, 1988, and proposed compromises to resolve differences.

Changes were made to the original seed mix in 1986 at the Mine's request, because several species were not available for needed revegetation work at the time. DOGM approved the revised mixes which contained species that are widely available and are adapted to the site. Data collected in June of 1988 showed ground cover in excess of 50% on the seeded areas.

Concerns regarding the temporary seed mix will be resolved by DOGM requesting Genwal to revise the MRP to use the final seed mix for any future temporary/contemporaneous revegetation. This will provide additional data through monitoring as a field demonstration of the proposed final revegetation.

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The U.S. Forest Service had requested mountain brome be eliminated from mix #1 and requested several introduced species be added to all seed mixes, including crested wheatgrass, intermediate wheatgrass, orchard grass, smooth brome. DOGM is concerned about the competitive nature of these species and the lack of data to justify their use as per the criteria of UMC 817.112. Since the revised seed mix was used in 1986 and has done very well (as noted above), it was agreed to leave the current seed mixes in the MRP with the understanding that if future monitoring shows problems with the species used, the Forest Service will be consulted to arrive at a mutually agreed revision.

While DOGM agrees that Bromus marginatus is now Bromus carinatus, the name marginatus needs to be retained in the MRP at the present time since seed suppliers have not yet made this taxinomic change. It was agreed to have marginatus follow carinatus in parenthesis on the seed mix.

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cc: S. Linner  
J. Leatherwood  
BT49/55-56